

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MARYLAND

3 (Northern Division)

4

5 MELVIN NEWSOME, et al.,)

6 Plaintiffs,)

7 vs.) Civil Action

8 UP-TO-DATE LAUNDRY, INC.,) No. S01-2257

9 et al.,)

10 Defendants.)

11

12 Baltimore, Maryland

13 Wednesday, February 5, 2003

14

15 DEPOSITION OF: NANCY STAIR

16

17 The video deposition of NANCY STAIR was

18 convened on Wednesday, February 5, 2003, commencing

19 at 10:03 a.m., at the offices of Whiteford, Taylor &

20 Preston, 7 St. Paul Street, Baltimore, Maryland,

21 before Karen Hinnenkamp, Registered Merit Reporter

22 and Notary Public.

BRYNTESON REPORTING, INC. (703) 768-8122

1 performance?

2 A No.

3 Q Do you have any reason to doubt his
4 credibility?

5 A No.

6 Q How do you refer to blacks, people who
7 are of black color, as a general matter?

8 A Colored people or blacks or African
9 Americans.

10 Q Do you ever refer to blacks as niggers?

11 A Yes.

12 Q Do you ever refer to blacks as niggers at
13 Up-To-Date Laundry?

14 A No.

15 Q Do you ever refer to your employees at
16 Up-To-Date Laundry who are black as niggers?

17 A No.

18 Q When have you referred to blacks as
19 niggers?

20 A West Virginia.

21 Q So when you're in West Virginia you refer
22 to blacks as niggers?

1 A When I lived there.

2 Q So you lived there until roughly 1994, is
3 that fair to say?

4 A Yes.

5 Q Were you born in West Virginia?

6 A No.

7 Q What period of time did you live in West
8 Virginia?

9 A 1964 to 1993.

10 Q And in 1993 did you move to Maryland?

11 A '94 I did.

12 Q After you left West Virginia in '93 where
13 did you move?

14 A 39 Tanglewood Road.

15 Q Where is that?

16 A My father's house.

17 Q What state?

18 A Maryland.

19 Q Okay. So when you were in West Virginia
20 from 1964 to 1993 you would refer to blacks as
21 niggers?

22 A It wasn't an everyday word. It was

1 A I gave her an honest answer.

2 Q And then what did she twist?

3 A She wrote up every charge that I called
4 them niggers, and that's a lie.

5 Q Did you tell Carol Uhler-Ford that the
6 company paid blacks, black workers less than
7 Hispanic workers because you believed that Latinos
8 are better workers?

9 A Off the record I told her something like
10 that.

11 Q Did you tell her that Hispanics deserve
12 better pay?

13 A Not in the deposition, no.

14 Q Did you tell her off the record?

15 A Off the record.

16 Q Did you tell Carol Uhler-Ford that
17 African Americans don't want to do any work?

18 A Not in the deposition.

19 Q Did you tell her off the record?

20 A As a general statement.

21 Q You made that general statement blacks
22 don't want to do any work, is that fair to say?